

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS HARAHUSH TO ADVO INTERROGATORIES
(ADVO/USPS-T3-11-12)

The United States Postal Service hereby provides the responses of witness Harahush to the following interrogatories of the Advo, Inc.: ADVO/USPS-T3-11-12, filed on March 30, 2000. Objections were filed to interrogatory 13.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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April 3, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARA HUSH TO
INTERROGATORIES OF ADVO INC.

ADVO/USPS-T3-11. Since base year 1996, have there been any changes in the way in which City Carrier Cost System (CCS) has been collected or processed? If so, please identify each such change.

RESPONSE:

Beginning in FY 1997 CCS used as its sampling frame a listing of city routes supplied from Address Management System (AMS) instead of the ORFEO frame. As a result of the July 1, 1996 implementation of Classification Reform, rate categories beginning with FY 1997 reflect the redesign of the rate structure. When the R-97 rate structure was implemented in January 1998, the Standard (A) single piece rate category was dropped as a data collection item. Additionally, various programming changes that allowed for more efficient data processing were implemented.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARA HUSH TO
INTERROGATORIES OF ADVO INC.**

ADVO/USPS-T3-12. For each Route Type (in witness Meehan's Cost Segment 7 Worksheets) for the base year, please provide (in Excel spreadsheet if possible) volume information, by shape and subclass, number of possible stops, number of possible deliveries, and number of actual stops for Business and Mixed stops that are:

- (a) Single Delivery Business
- (b) Multiple Delivery Business
- (c) Mixed Business and Residential
- (d) Of the sums for (a) through (c) do not match the totals in witness Meehan's workpapers, please explain why and provide a reconciliation, if necessary.

RESPONSE:

Refer to USPS-LR-I-265, which will be filed shortly.

DECLARATION

I, Thomas W. Harahush, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Thomas W. Harahush
Thomas W. Harahush

Date: 4/3/2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

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